

1 PHILLIP A. TALBERT
2 United States Attorney
3 ALYSON A. BERG
4 Assistant U.S. Attorney
5 2500 Tulare Street, Suite 4401
6 Fresno, CA 93721
7 Telephone: (559) 497-4000
8 Facsimile: (559) 497-4099

9 Attorneys for Plaintiff
10 United States of America

11
12 IN THE UNITED STATES DISTRICT COURT
13
14 EASTERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 APPROXIMATELY \$1,786,071.00 IN
20 U.S. CURRENCY, and

21 APPROXIMATELY \$242,963.00 IN
22 U.S. CURRENCY,

23 Defendants.

24 CASE NO. 1:22-MC-00119-AWI

25 STIPULATION AND ORDER EXTENDING TIME
26 FOR FILING A COMPLAINT FOR FORFEITURE
27 AND/OR TO OBTAIN AN INDICTMENT
28 ALLEGING FORFEITURE

29 It is hereby stipulated by and between the United States of America and potential claimant Sohail
30 Hussain Mamdani (“claimant”), by and through their respective counsel, as follows:

31 1. On or about June 2, 2022, claimant filed timely claims in the administrative forfeiture
32 proceeding with the Drug Enforcement Administration with respect to the Approximately \$1,786,071.00
33 in U.S. Currency and Approximately \$242,963.00 in U.S. Currency (hereafter collectively “defendant
34 currency”), which were seized on March 3, 2022.

35 2. The Drug Enforcement Administration sent the written notice of intent to forfeit required
36 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
37 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant
38 filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
4 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
5 parties. That deadline was August 31, 2022.

6 4. By Stipulation and Order filed August 16, 2022, the parties stipulated to extend to October
7 30, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 5. By Stipulation and Order filed October 28, 2022, the parties stipulated to extend to
11 December 9, 2022, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
13 subject to forfeiture.

14 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
15 January 13, 2023, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
17 subject to forfeiture.

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1 7. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to January 13, 2023.

4 Dated: December 6, 2022

PHILLIP A. TALBERT
United States Attorney

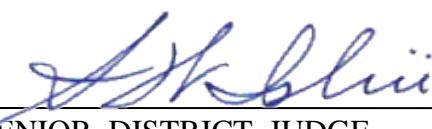
6 By: /s/ Alyson A. Berg
7 ALYSON A. BERG
Assistant U.S. Attorney

9 Dated: December 6, 2022

/s/ Kevin P. Rooney
10 KEVIN P. ROONEY
11 Attorney for claimant
Sohail Hussain Mamdani
(Signature approved by email on 12/6/22)

12 IT IS SO ORDERED.

13 Dated: December 7, 2022


14 SENIOR DISTRICT JUDGE